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May 19, 2025

Via ECF

Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Nicole Daedone and Rachel Cherwitz, 23-CR-146

Dear Judge Gujarati:

On behalf of Defendants Rachel Cherwitz and Nicole Daedone, please find enclosed a proposed order to permit Paralegals Kamille Simons, Kimberly Stammer, and Michael Sawyer, and Attorney Kelly Lenahan-Pfahlert to bring into the courtroom their laptop computers and cellular telephones beginning May 20, 2025. Ms. Lenahan-Pfahlert, Ms. Simons, Ms. Stammer, and Mr. Sawyer will be assisting defense counsel during trial in the above-captioned matter.

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Ms. Lenahan-Pfahlert is employed by Ballard Spahr, LLC, and is admitted *pro hac vice* to the United States District Court for the Eastern District of New York. Ms. Simons and Ms. Stammer are employed by Ballard Spahr LLP, and Mr. Sawyer is employed by Bonjean Law Group, PLLC.

Respectfully submitted,

/s/JENNIFER BONJEAN

/s/KELSEY H. KILLION

Jennifer Bonjean

Kelsey H. Killion

Counsel for Nicole Daedone

Bonjean Law Group, PLLC

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/s/CELIA A. COHEN

/s/MICHAEL P. ROBOTTI

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK.

----- X

UNITED STATES OF AMERICA,

v.

PROPOSED ORDER

23-CR-146 (DG)

RACHEL CHERWITZ and
NICOLE DAEDONE,

Defendants.

----- X

Defendants have moved this Court for permission to permit Paralegal Michael Sawyer of Bonjean Law Group, PLLC, and Paralegals Kamille Simons and Kimberly Simons and Attorney Kelly Lenahan-Pfahlert from Ballard Spahr LLP, who will be assisting defense counsel during trial in the above captioned matter, to bring into the courtroom their laptop computers and cellular telephones beginning May 20, 2025.

This application shall be restricted to the time period beginning May 20, 2025, and continue until the end of trial before Judge Diane Gujarati, in the above-captioned matter.

The above application is _____.

The Hon. Diane Gujarati

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

_____X

United States

ORDER
Docket Number: 23-cr-146 (DG)

VS.

Rachel Cherwitz and Nicole Daedone

_____X

ORDERED that the following attorney(s) are authorized to bring the Personal Electronic Device(s) and/or the General-Purpose Computing Device(s) (collectively, "Devices") listed below into the Courthouse for use in a proceeding or trial in the action.

Attorney	Device(s)
Kelly Lenahan-Pfahlert	Laptop and phone starting May 20, 2025

(Attach Extra Sheet If Needed)

The attorney(s) identified in this Order must present a copy of this Order when entering the Courthouse. Bringing any authorized Device(s) into the Courthouse or its Environs constitutes a certification by the attorney that he or she will comply in all respects with the restrictions and obligations set forth in Standing Order M10-468, as Revised.

SO ORDERED

Dated: _____

UNITED STATES DISTRICT JUDGE